

1 Joseph R. Saveri (State Bar No. 130064)  
2 James G. Dallal (State Bar No. 277826)  
3 JOSEPH SAVERI LAW FIRM, INC.  
4 505 Montgomery Street, Suite 625  
5 San Francisco, California 94111  
6 Telephone: (415) 500-6800  
7 Facsimile: (415) 395-9940

8 *Co-Lead Class Counsel*

9  
10  
11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13  
14  
15 IN RE: HIGH-TECH EMPLOYEE ANTITRUST  
16 LITIGATION  
17  
18 THIS DOCUMENT RELATES TO:  
19 ALL ACTIONS

20 Case No. 5:11-cv-2509

21 **JOSEPH SAVERI LAW FIRM, INC.'S  
MOTION TO ENLARGE TIME**

22  
23 Pursuant to Local Rule 6-3, the Joseph Saveri Law Firm, Inc. ("JSLF") submits this Motion  
24 seeking an extension of time to file a joint submission regarding attorneys' fees. On July 9, 2015, the  
25 Court ordered that JSLF and Lieff Cabraser Heimann & Bernstein, LLP ("LCHB") jointly submit a  
26 document on July 16, 2015, summarizing disputes concerning JSLF's time entries, on an entry-by-entry  
27 basis. For the reasons briefly described below and more fully stated in the attached Declaration of  
28 Joseph R. Saveri, JSLF respectfully requests that the Court grant an extension to July 20, 2015 for  
JSLF and LCHB to file a joint submission.

29  
30 JSLF and LCHB have engaged in time-consuming, exhaustive discussions to identify and  
31 attempt to resolve disputes concerning JSLF's time entries. The process has been difficult, particularly  
32 given the volume of LCHB's criticisms as well as LCHB's refusal to provide written objections to most  
33 of the specific time entries until late in the evening on Wednesday, July 15, 2015. Despite these  
34 difficulties, LCHB and JSLF have been able to narrow the entries in dispute by over 100 entries. JSLF  
35 believes that further discussion between the parties could substantially narrow the entries in dispute.

For these reasons, JSLF respectfully requests that the Court grant JSLF's motion to enlarge time.

Dated: July 16, 2015

## JOSEPH SAVERI LAW FIRM, INC.

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)  
James Dallal (State Bar No. 277826)  
JOSEPH SAVERI LAW FIRM, INC.  
505 Montgomery, Suite 625  
San Francisco, CA 94111  
Telephone: 415. 500.6800  
Facsimile: 415. 395.9940